

## Exhibit 1

STATE OF NORTH DAKOTA

IN DISTRICT COURT

COUNTY OF BURLEIGH

SOUTH CENTRAL JUDICIAL DISTRICT

State of North Dakota,	)	
	)	
Plaintiff,	)	
	)	
-vs-	)	<b>INFORMATION</b>
	)	
Dawson Mackenzie Rouse,	)	SA # F785-22-06
	)	Cr. NQ8-2022-CR-01618
Defendant.	)	
.....	)	

[¶1] Julie Lawyer, State's Attorney for Burleigh County, charges that on or about the 1st day of November, 2019 through the 24th day of April, 2020, in Burleigh County, the defendant, Dawson Mackenzie Rouse, did commit the crimes of **Gross Sexual Imposition (CST #C99029) (Counts 1-5)**, **Solicitation of a Minor (CST #C00409) (Count 6)**, **Corruption of a Minor (CST #C00403) (Counts 7-9)**, committed as follows:

[¶2] **COUNT 1:** On or about November 1, 2019 through April 24, 2020, the defendant, under twenty-two (22) years of age, willfully engaged in a sexual act with another, or caused another to engage in a sexual act, and the victim was less than fifteen (15) years old; specifically, the defendant, a twenty-one-year-old male, inserted his penis into the vagina of J.T., a fourteen-year-old girl, while in a vehicle at Kimball Bottoms;

N.D.C.C. 12.1-20-03(1)(d)	MANDATORY MINIMUM: 5 years' probation, Sex
12.1-20-03(3)(b)	offender registration
12.1-32-01(2)	CLASS A FELONY

**COUNT 2:** On or about November 1, 2019 through April 24, 2020, the defendant, under twenty-two (22) years of age, willfully engaged in a sexual act with another, or caused another to engage in a sexual act, and the victim was less than fifteen (15) years old; specifically, the defendant, a twenty-one-year-old male, inserted his penis into the vagina of J.T., a fourteen-year-old girl, while wearing a condom, in the shop at his parents' home in Burleigh County;

N.D.C.C. 12.1-20-03(1)(d)	MANDATORY MINIMUM: 5 years' probation, Sex
12.1-20-03(3)(b)	offender registration
12.1-32-01(2)	CLASS A FELONY

**COUNT 3:** On or about November 1, 2019 through April 24, 2020, the defendant, under twenty-two (22) years of age, willfully engaged in a sexual act with another, or caused another to engage in a sexual act, and the victim was less than fifteen (15) years old; specifically, at a time after the incident described in Count 2, the defendant, a twenty-one-year-old male, inserted his penis into the vagina of J.T., a fourteen-year-old girl, while wearing a condom, in the shop at his parents' home in Burleigh County;

N.D.C.C. 12.1-20-03(1)(d)	MANDATORY MINIMUM: 5 years' probation, Sex
12.1-20-03(3)(b)	offender registration
12.1-32-01(2)	CLASS A FELONY CLASS A FELONY

**COUNT 4:** On or about January 24, 2020, the defendant, under twenty-two (22) years of age, willfully engaged in a sexual act with another, or caused another to engage in a sexual act, and the victim was less than fifteen (15) years old; specifically, the defendant, a twenty-one-year-old male, inserted his penis into the vagina of J.T., a fourteen-year-old girl, while not wearing a condom, in the shop at his parents' home in Burleigh County;

N.D.C.C. 12.1-20-03(1)(d)  
12.1-20-03(3)(b)  
12.1-32-01(2)

MANDATORY MINIMUM: 5 years' probation, Sex offender registration  
CLASS A FELONY

**COUNT 5:** On or about January 1, 2020 through April 24, 2020, the defendant, under twenty-two (22) years of age, willfully engaged in a sexual act with another, or caused another to engage in a sexual act, and the victim was less than fifteen (15) years old; specifically, the defendant, a twenty-one-year-old male, engaged in a sexual act involving his penis and the vulva of R.J., a thirteen-year-old female;

N.D.C.C. 12.1-20-03(2)(a)  
12.1-20-03(3)(b)  
12.1-32-01(2)

MANDATORY MINIMUM: 5 years' probation, Sex offender registration  
CLASS A FELONY

**COUNT 6:** On or about March 15, 2019 through April 15, 2019, the defendant, an adult, willfully solicited with the intent to engage in a sexual act with a minor under fifteen (15) years of age; specifically, the defendant solicited K.S., a fourteen-year-old girl, to engage in a sexual act;

N.D.C.C. 12.1-20-05(2)  
12.1-32-01(4)

MANDATORY MINIMUM: 5 years' probation, Sex offender registration  
CLASS C FELONY

**COUNT 7:** On or about April 26, 2019, the defendant, an adult under twenty-two (22) years of age, willfully engaged in, or caused another to engage in, a sexual act with a minor fifteen (15) years of age or older; specifically, the defendant, a twenty-year-old male, inserted his penis into the vagina of M.R., a fifteen-year-old girl;

N.D.C.C. 12.1-20-05(1)  
12.1-32-01(5)

MANDATORY MINIMUM: Sex offender registration  
CLASS A MISDEMEANOR

**COUNT 8:** On or about December 1, 2019 through April 24, 2020, the defendant, an adult under twenty-two (22) years of age, willfully engaged in, or caused another to engage in, a sexual act with a minor fifteen (15) years of age or older; specifically, the defendant, a twenty-one-year-old male, inserted his penis into the mouth of D.B., a seventeen-year-old girl;

N.D.C.C. 12.1-20-05(1)  
12.1-32-01(5)

MANDATORY MINIMUM: Sex offender registration  
CLASS A MISDEMEANOR

**COUNT 9:** On or about December 1, 2019 through April 24, 2020, the defendant, an adult under twenty-two (22) years of age, willfully engaged in, or caused another to engage in, a sexual act with a minor fifteen (15) years of age or older; specifically, the defendant, a twenty-one-year-old male, inserted his finger into the vagina of D.B., a seventeen-year-old girl;

N.D.C.C. 12.1-20-05(1)  
12.1-32-01(5)

MANDATORY MINIMUM: Sex offender registration  
CLASS A MISDEMEANOR

[¶3] This against the peace and dignity of the State of North Dakota.

Dated this 21<sup>st</sup> day of June, 2022.

/s Julie Lawyer

Julie Lawyer, BAR ID: 05693  
Burleigh County State's Attorney

**State's Witnesses:**

Brandon Rask	Joseph Olsen	J.T.
Randy W. Helderop	Taylor Roman	R.J.
Brett Naill	Jacob Bratsch	K.S.
Jeremy Seeklander	Nicole Moritz-Adolf	M.R.
Lance Allerdings	Matthew Wingenbach	D.B.
Jonathan Lahr	Lab Analyst	

[¶4] Based on the attached affidavit, the Court finds probable cause for the charged offenses.

Dated this \_\_\_\_\_ day of June, 2022.

Signed: 6/22/2022 4:43:16 PM



District Court Judge

kaw

STATE OF NORTH DAKOTA      )  
                                )  
COUNTY OF BURLEIGH      )  
                                )

08-2022-CR-01618

**AFFIDAVIT**

I, Detective Brandon Rask of the Bismarck Police Department, being first duly sworn depose and state the following:

1. That I am a trained and licensed peace officer with 19.5 years of experience with jurisdiction to enforce state law in North Dakota.
2. That from February 1st, 2018 to April 24<sup>th</sup>, 2020, in Burleigh County, North Dakota.
3. The suspect was identified as Dawson Mackenzie Rouse and is 23 years of age.
4. The following gives rise to probable cause to charge the suspect with:

A Felony 12.1-20-03 Gross Sexual Imposition of Minor Less Than 15 (R.J.)

A Misdemeanor 12.1-20-05 Corruption of a Minor (M.R.)

C Felony 12.1-20-05 Solicitation of a Minor (less than 15) (K.S.)

A Felony 12.1-20-03 Gross Sexual Imposition (less than 15) (J.T.)

A Felony 12.1-20-03 Gross Sexual Imposition (less than 15) (J.T.)

A Felony 12.1-20-03 Gross Sexual Imposition (less than 15) (J.T.)

A Felony 12.1-20-03 Gross Sexual Imposition (less than 15) (J.T.)

A Misdemeanor 12.1-20-05 Corruption of a Minor (D.R.)

A Misdemeanor 12.1-20-05 Corruption of a Minor (D.R.)

5. Circumstances and/or other facts:

Beginning April 23<sup>rd</sup>, 2020, I began an investigation into the reported conduct of Dawson Mackenzie Rouse. During this investigation, four juvenile females were identified as having electronic communications with Rouse over the social media messaging application Snapchat. Some of these females were reported to have snuck out in the middle of the night to meet with Rouse. As a result of this information, all four juvenile females were interviewed to determine the extent of their contact with Rouse. As a result of these initial interviews, Rouse was arrested on April 24<sup>th</sup>, 2020 at which time an iPhone was seized from his possession. An examination of this iPhone yielded the identities of numerous other minor females that Rouse had been communicating with. Based on this information, dozens of interviews of minor females were conducted. These interviews revealed criminal conduct by Dawson Rouse in the form of multiple sex offenses against minors. This affidavit is in support of probable cause to charge Dawson Rouse with the sex offenses listed above.

During an interview with 13-year-old victim R.J., she disclosed that she had become SnapChat friends with Rouse after adding him on SnapChat in 2020. She indicated that she added him simply because her friends E.V. and M.G. were friends with him as well. During conversations with Rouse on SnapChat, Rouse convinced R.J. to sneak out in the middle of the night and meet with him. After picking her up, Rouse took R.J. to the detached garage at his parents' residence of 3603 Heartland Loop in Burleigh County. Upon arriving at this location, R.J. indicated that Rouse made her undress. He then retrieved a condom from a black toolbox with his name on it. She reported that he then laid her on the back of a boat that was present in the garage. It is here where he had sex with her. During vaginal intercourse, R.J. reported that he held her down and pulled her hair. The used condom was thrown away after the encounter ended. This meeting occurred on an unknown night between January 1<sup>st</sup>, 2020 and April 24<sup>th</sup>, 2020. R.J. provided a detailed

account of the physical appearance of the garage's interior as well as an account of numerous property items that were present. Rouse was 21 years of age and R.J. was 13 years of age at the time of occurrence.

During an interview with M.R. on April 30<sup>th</sup>, 2020, she disclosed that she had become SnapChat friends with Rouse in March of 2019 after he had randomly requested her as a friend on Snapchat. Within 2 weeks of communicating with Rouse, M.R. disclosed to him her age of 15. Rouse identified himself to her as 17. M.R. indicated that she and Rouse made arrangements to meet at a park in Driscoll, ND. Rouse picked her up at this park in Driscoll and drove her to a nearby grove of trees within 1 mile of Driscoll. At this location, Rouse took her clothes off, took nude photographs of her and engaged in vaginal intercourse. During intercourse, M.R. reports Rouse choking her, pulling her hair, and scratching her. Chat communications in M.R.'s phone and locational data found in the examination of Rouse's phone corroborate this encounter occurring on April 26<sup>th</sup>, 2019. After this initial meeting, another text communication between M.R. and Rouse occurred on May 20<sup>th</sup>, 2019. During this conversation, Rouse asks, "Can we do what we did that onetime again?" To this, M.R. asks him "Like you come to Driscoll and you take me out somewhere and we do whatever," Rouse then replies, "Yes." M.R. was in Driscoll during her communications and interactions with Rouse. Driscoll is located in Burleigh County. During the April 26<sup>th</sup>, 2019 sexual encounter, Rouse was 20 years of age while M.R. was 15 years of age.

During an interview with K.S. on May 5<sup>th</sup>, 2020, she disclosed that she became friends with Rouse approximately 1 year prior. Snapchat records show that conversations likely occurred between K.S. and Rouse in April of 2019. During her communications with Rouse, she indicates that he convinced her to sneak out to meet with him late at night. She did so by leaving her residence by climbing out of a basement window. She did this because Rouse said he would obtain for her a Juul pod, which she was not old enough to purchase. She thought she was meeting him just to pick up the Juul pod, but he told her to get in his car which she described as a "type of Jeep." During the drive, Rouse talked about being a student at the University of Mary and working at McDowell Dam. K.S. recalls Rouse touching her thigh during this drive. Upon arriving to drop her off back at home, K.S. said that Rouse made her kiss him and then expressed to her that he wanted to have sex with her. She declined but stated Rouse attempted to convince her and begged her to have sex in his back seat. She ended up leaving his car and described the encounter to me as "scary." K.S. indicated that she had only communicated with him from her residence which is also where their short drive occurred. She resides in Burleigh County. All conduct reported by K.S. is alleged to have occurred between 3/15/2019 and 4/15/2019. K.S. would have been 14 years of age and Rouse 20 years of age at the time Rouse solicited K.S. for sexual intercourse.

During an interview with J.T. on May 7<sup>th</sup>, 2020, J.T. indicated that she had first become friends with Rouse on Snapchat in November or December of 2019. She indicated that she told Rouse "right away" that she was 14 years of age. J.T. stated that Rouse had requested nude images from her after knowing her age. J.T. stated that she had met Rouse in person between 20 and 30 times. She said that Rouse would try to have sex with her during every meeting. J.T. confirmed that sexual intercourse did occur between J.T. and Rouse. She indicated that sexual intercourse occurred a minimum of 4 times. One of these occurrences happened in Rouse's car at the Kimball Bottoms Recreation Area, more commonly referred to as "The Desert." The remaining times occurred in "his shop" at 3603 Heartland Loop. Both of these locations reside in Burleigh County. Rouse reportedly used a condom during every encounter except for one. J.T. later confirmed that during that single instance, Rouse offered to buy J.T. the Plan B pill if she would let him have sex without a condom. A receipt for a Plan B One Step pill had previously been located in the detached garage at Rouse's parents' residence. The purchase was dated January 24<sup>th</sup>, 2020. After they had sex on this date, J.T. confirmed that Rouse drove her to CVS Pharmacy in Bismarck and provided her a credit card to make the purchase which she did do. Text message communications located on Rouse's phone corroborate this event. She further described that Rouse would leave hickeys, scratches, and bruises

during sex. She also described Rouse choking her and pulling her hair during sex. All conduct reported by J.T. is alleged to have occurred between 11/01/2019 and 4/24/2020. J.T. would have been 14 years of age and Rouse at least 20 years of age during this time frame.

During an interview with D.B. on May 13<sup>th</sup>, 2020, she disclosed that she became Snapchat friends with Rouse shortly before Christmas in 2019. They communicated on Snapchat during which D.B. informed Rouse that she was 17 years of age. After learning of her age Rouse solicited D.B. for nude images. D.B. indicated that she did provide photographs of her vagina to Rouse. Rouse also provided images of his penis to D.B. An arrangement was made through text messaging to meet in a park near D.B.'s residence for the purposes of sex. Upon meeting at the park, D.B. reportedly performed oral sex on Rouse during which he ejaculated in her mouth. Approximately 15 to 20 minutes after this, Rouse digitally penetrated D.B.'s vagina. All conduct reported by D.B. is alleged to have occurred between 12/1/2019 and 4/24/2020. D.B. was 17 years of age while Rouse was 21 years of age during this time frame.

Probable cause exists that Dawson Rouse committed 5 counts of the offense of (A) Felony - Gross Sexual Imposition with a victim under the age of 15 when he met with 13-year-old J.T. on 4 occasions and R.J. on 1 occasion and engaged in vaginal intercourse with both at two separate locations in Burleigh County.

Probable cause exists that Dawson Rouse committed 3 counts of the offense of (A) Misdemeanor – Corruption of a Minor by engaging in sex acts with M.R. and twice with D.B. Both victims were minors 15 to 17 years of age at the time of the sex acts while Rouse was an adult at the time of the sex acts. Each of the minors indicated that the sex acts occurred within Burleigh County.

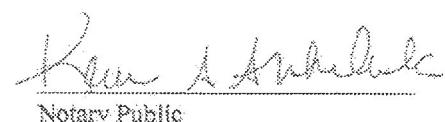
Probable cause exists that Dawson Rouse committed 1 count of the offense of (C) Felony – Solicitation of a Minor by soliciting K.S. to engage in sexual intercourse with him. K.S. was 14 years of age at the time of the solicitation while Rouse was an adult. K.S. indicated that this solicitation occurred inside Rouse's vehicle while parked within Burleigh County.

Dated this 21<sup>st</sup> day of June, 2022.



Peace Officer/ Affiant

Subscribed and Sworn before me on the 21 day of JUNE, 2022

  
Kerri A. Anheluk  
Notary Public